UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

Case No. 11-36977-KRH

Chapter 13

Eli Rich,

Debtor/Plaintiff,

v.

Caliber Home Loans, Inc.,

Defendant.

MOTION FOR FINDING OF CIVIL CONTEMPT PURSUANT TO 11 U.S.C. § 362

COMES NOW Eli Rich, the plaintiff herein, by counsel, and respectfully represents to the Court in support of his Motion as follows:

- 1. The Debtor/Plaintiff filed his Chapter 13 case on November 1, 2011 and was assigned case number 11-36977-KRH. This case was closed on January 20, 2015.
- 2. This Motion is filed pursuant to 11 U.S.C. § 362. This is a "core proceeding" pursuant to 28, U.S.C. § 157, and is a civil proceeding arising in and related to a case under Title 11 pursuant to 28 U.S.C. § 1334(b).

Robert A. Canfield, VSB#16901
Canfield, Baer & Heller, LLP
2201 Libbie Avenue, Suite 200
Richmond, VA 23230
804-673-6600
804-673-6604
bcanfield@canfieldbaer.com
Counsel for Eli Rich

- 3. Venue is proper in this district pursuant to 28 U.S.C. § 1409(a) as a proceeding arising in and related to a case under Title 11 commenced in this district.
- 4. The Debtor/Plaintiff included creditor Vericrest Financial on Schedule D of his petition, as Vericrest had a Deed of Trust on Debtor's real property located at 3131 Cove View Lane, Midlothian, Virginia 23112. The loan is now owned by Vericrest's successor-in-interest, Caliber Home Loans, Inc.
- 5. On November 17, 2014, T.J. Stewart, counsel for Creditor U.S. Bank Trust, N.A., as Trustee, for VOLT Asset Holdings NPL3, filed a Response to Notice of Final Cure Payment Pursuant to Bankruptcy Rule 3002.1(g), stating that the account was up-to-date. Please see Exhibit A.
- 6. Despite this filing, Caliber has been harassing Debtor/Plaintiff in violation of 11 U.S.C. § 362, stating over the telephone that Debtor/Plaintiff owes \$3,169.86 in arrearages, while another representative has told Debtor/Plaintiff via telephone that Debtor/Plaintiff owes \$5,000.00.
- 7. Debtor/Plaintiff has also received invoices from Caliber stating that he is in arrears and charging him unknown fees.
- 8. Debtor/Plaintiff sent a letter dated March 19, 2015 to Caliber, requesting an explanation of these undefined fines and for clarification of the purported arrearage. See Exhibit B.
- 9. Caliber's only response was a letter acknowledging the March 19th letter. It did not respond to any of Debtor/Plaintiff's inquiries. See <u>Exhibit C</u>.
- 10. Caliber's inaction to clarify these charges and rectify its billing errors, while trying to collect from Debtor/Plaintiff, is in violation of 11 U.S.C. § 362.

11. Debtor/Plaintiff is entitled to punitive damages in the amount of \$10,000.00, plus reasonable attorney's fees and his costs expended herein.

WHEREFORE, Eli Rich asks that the defendant, Caliber Home Loans, Inc., be held in civil contempt pursuant to 11 U.S.C. §362 and that the plaintiff, Eli Rich, be awarded punitive damages in the amount of \$10,000.00 and be awarded compensatory damages in the amount of \$25,000.00 plus reasonable attorney's fees and his costs expended herein.

ELI RICH

By: /s/ Robert A. Canfield
Counsel

Robert A. Canfield, VSB #16901 Canfield, Baer & Heller, LLP 2201 Libbie Avenue, Suite 200 Richmond, VA 23230 804-673-6600 804-673-6604 Counsel for Debtor, Eli Rich

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE:

Eli Rich

Case No. 11-36977-KRH

Debtor.

Chapter 13

3131 Cove View Lane Midlothian, Virginia 23112

SSN: xxx-xx-3187

NOTICE OF MOTION AND NOTICE OF HEARING

Eli Rich has filed papers with the Court to obtain the relief sought in his Motion.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief requested in the Motion for Contempt, or if you want the Court to consider your views on the motion, then within twenty-one (21) days from the date of service of this motion, you or your attorney must:

• File with the Court, at the address shown below, a written response explaining your position. If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the expiration of the fourteen day period. The address for the Court is as follows:

Clerk of the Court United States Bankruptcy Court Eastern District of Virginia, Richmond Division 701 E. Broad Street Richmond, VA 23219

You must also mail a copy to:

Robert A. Canfield, Esquire 2201 Libbie Ave., Suite 200 Richmond, VA 23230 • Attend a hearing on the motion scheduled to be held on <u>July 29, 2015 at 12:00</u> <u>p.m.</u>, Courtroom 5000, at the United States Bankruptcy Court, 701 East Broad Street, Richmond, VA 23219.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the request of Eli Rich.

Dated: June 29, 2015

By: /s/ Robert A. Canfield
Counsel

Robert A. Canfield, VSB #16901 Canfield, Baer & Heller, LLP 2201 Libbie Avenue, Suite 200 Richmond, VA 23230 \$\mathbb{\textit{804-673-6600}}\$\mathbb{\textit{804-673-6604}}\$ Counsel for Debtor, Eli Rich

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June, 2015, a true copy of the foregoing Motion and Notice was sent either electronically or by U.S. Mail, first-class, postage prepaid, to all necessary parties as follows on the attached mailing matrix and to:

T.J. Stewart Brock & Scott, PLLC 5121 Parkway Plaza Blvd., Suite 300 Charlotte, NC 28217

Caliber Home Loans, Inc. P.O. Box 24610 Oklahoma City, OK 73124

Eli Rich 3131 Cove View Lane Midlothian, Virginia 23112

CT Corporation System R/A Caliber Home Loans, Inc. 4701 Cox Road, Ste. 285 Glen Allen, VA 23060 Joe Anderson Chairman/CEO Caliber Home Loans, Inc. 13801 Wireless Way Oklahoma City, OK 73134 Served via Regular & Certified Mail

By: /s/ Robert A. Canfield
Counsel

Filed 06/29/15 Entered 06/29/15 10:52:26 Case 11-36977-KRH Doc 52

Document

Page 7 of 14

Case 11-36977-KRH Doc

Filed 11/17/14 Entered 11/17/14 14:51:59 Desc Main Page 1 of 2 Document

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: **ELI RICH**

DEBTOR

CASE NO. 11-36977-KRH **CHAPTER 13**

RESPONSE TO NOTICE OF FINAL CURE PAYMENT PURSUANT TO BANKRUPTCY RULE 3002.1(g)

To the Clerk Debtors, Debtor's Counsel and Chapter 13 Trustee:

The Creditor, U.S. Bank Trust, N.A., as Trustee for VOLT Asset Holdings NPL3, agrees with the Notice of Final Cure payment filed on November 1, 2011.

The Creditor agrees that the amount required to cure the pre-petition delinquency as set forth in Creditor's claim and any supplements and/or amendments thereto has been paid in full.

The Debtor is contractually due for the November 1, 2014 payment.

/s/ T.J. Stewart

T.J. Stewart, Counsel for Creditor U.S. Bank Trust, N.A., as Trustee for VOLT Asset Holdings NPL3 State Bar Number 48412



Case 11-36977-KRH Doc 52 Filed 06/29/15 Entered 06/29/15 10:52:26 Desc Main Document Page 8 of 14

Case 11-36977-KRH Doc

Filed 11/17/14 Entered 11/17/14 14:51:59 Desc Main Document Page 2 of 2

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE; ELI RICH

DEBTOR

CASE NO. 11-36977-KRH CHAPTER 13

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that the RESPONSE TO NOTICE OF FINAL CURE PAYMENT PURSUANT BANKRUPTCY RULE 3002.1(g) in the above captioned case were this day served upon the below named persons by electronic service and/or by mailing, postage prepaid, first class mail a copy of such instrument to each person(s), parties, and/or counsel at the addresses shown below:

Eli Rich 3131 Cove View Lane Midlothian, VA 23112

Robert A. Canfield 2201 Libbie Ave., Suite 200 Richmond, VA 23230

Robert E. Hyman P.O. Box 1780 Richmond, VA 23218-1780

This 17th day of November, 2014.

/s/ Ryan Tomlin

Ryan Tomlin
Brock & Scott, PLLC
5121 Parkway Plaza Blvd., Suite 300
Charlotte, NC 28217

Ph: (704) 369-0676 Fax: (704) 369-0760

bankruptey@brockandscott.com

CANFIELD BAER LLP

ATTORNEYS & COUNSELORS AT LAW

2201 Libbie Avenue Suite 200 Richmond, Virginia 23230 T 804-673-6600 | F 804-673-6604 www.canfieldbaer.com

March 19, 2015

Caliber Home Loans, Inc. P.O. Box 24610 Oklahoma City, OK 73124

Re: Eli Rich; Account No. 9800912579

Dear Sir or Madam,

I represent Eli Rich. Enclosed as Exhibit A, please find correspondence dates March 9, 2015 that Caliber sent to him. Under the section labeled *Transaction Activity*, you have listed various charges, which have been marked for your convenience. I would ask that you please provide me with a specific explanation of said charges.

In addition to the unexplained charges, it appears that there is some type of miscommunication within Caliber concerning my client's account. One Caliber representative told Mr. Rich via telephone that he was delinquent on his mortgage in the amount of \$3,169.86, while another representative told him that amount was nearer to \$5,000.00. However, it would appear that Mr. Rich is not delinquent, as evidenced by the attached Exhibit B, which is the Response to Notice of Final Cure Payment Pursuant to Bankruptcy Rule 3002.1(g), which was filed in Mr. Rich's Chapter 13 bankruptcy proceeding. This document plainly states that, as of November 17, 2014, there was no delinquency. As Mr. Rich has paid every mortgage payment due since that time, as evidence by Exhibit A, I find it extremely difficult to believe that he owes an arrearage on his account.

I need an explanation for the unexplained charges and for the confusion over Mr. Rich's purported arrearage immediately. As it currently stands, it appears that Caliber is violated the U.S. Bankruptcy Code. We would like to give Caliber an opportunity to produce an explanation. However, without a written explanation from Caliber within twenty-one (21) days, we will have no choice but to file suit against Caliber in the United States Bankruptcy Court, asking that Caliber be held in contempt and seeking both damages and legal fees and costs.

Very truly yours,

Robert A. Canfield

Managing Partner

RAC/kw

CC: Mr. Eli Rich



ELIRICH

CALIBER RETURN SERVICE COCUMENT Please do not send mail to this address PO Box 819063 Dallas TX 75281-9063

Page 10 of 14

Informational Statement

Statement Date: 03/09/2015

If you have questions or concerns about your statement, please contact us at 1-800-401-6587 between the hours of 8:00am and 7:00pm Monday through Friday (CST).

Email us at customerservice@CaliberHomeLoans.com or visit our website at http://www.caliberhomeloans.com.

Account Number 9800912579 **Payment Date** 04/01/15 Payment Amount \$1,484.58

Property Address: 3131 COVE VIEW LANE MIDLOTHIAN VA 23112

Account Information	
Outstanding Principal	\$386,810.32
Interest Rate (Until 07/01/50)	2.00000%
Prepayment Penalty	No
Deferred Fees	\$0.00
Deferred Principal	\$45,377.90
Deferred Interest	\$0.00
Deferred Escrow	\$0.00
Deferred Late Charge Balance	\$0.00
Unapplied Funds	\$190.97
Contractual Due Date (for information only)	02/01/15
Maturity Date	07/01/2050
Current Escrow Balance	\$849.62
Bankruptcy Status	40.10102
Bankruptcy Chapter	N/A

8-759-62253-0003578-001-1-000-010-000-000

3131 COVE VIEW LN MIDLOTHIAN VA 23112-4383

Explanation of Amount		
Principal		\$629.60
Interest		\$642.59
Escrow (Taxes, Insurance, or PMI)		\$212.39
Optional Products		\$0.00
Ancillary		\$0.00
Regular Monthly Payment		\$1,484.58
Total Amount		\$1,484,58
Past Payments Breakdown:	Paid Last Month	Paid Year- To-Date
Principal	\$1,876.28	\$1,251.88
Interest	\$1,940.31	\$1,292.50
Escrow (Taxes, Insurance, or PMI)	\$954.27	\$636,18
Fees	\$0.00	\$0.00
Late Charges	\$0.00	\$0.00
Unapplied Balance	\$0.00	\$190.97
Total	\$4,770.84	\$3,371.53

Transaction	Activity	(06/14/14 -	03/09/15)

Date	Description	<u>Charges</u>	<u>Payments</u>
00-00-0000	Payment		
12-03-2014	Mortgage Payment		\$1,590,28
12-31-2014	Mortgage Payment	~	\$1,590.28
01-13-2015	Escrow Disbursement	\$65.35 \	
01-22-2015	Expense Advances	-\$450.00 \L	
01-22-2015	Expense Advances	-\$150,00	
01-22-2015	Expense Advances	-\$150.00	
01-31-2015	Single Item Receipt		\$190.97
02-04-2015	Mortgage Payment		\$1,399,31
02-04-2015	Single Item Receipt		\$190.97

Important Messages

To the extent your original obligation was discharged, or is subject to an automatic stay of bankruptcy under Title 11 of the United States Code, this statement is for compliance and/or informational purposes only and does not constitute an attempt to collect a debt or to impose personal liability for such obligation. If your Plan requires you to make post-petition mortgage payments directly to the trustee, any such payments should be remitted to the Trustee, any such payments should be remitted to the Trustee directly in accordance with the orders of the Bankruptcy Court.

PLEASE WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK AND RETURN THE BOTTOM PORTION

ELI RICH 3131 COVE VIEW LN MIDLOTHIAN VA 23112-4383

CALIBER HOME LOANS, INC.

DALLAS, TX 75265-0856

Account Regular Number Payment 9800912579 \$1,484.58 **Payment Amount** \$1,484.58

Check here and see reverse for address correction.

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Additional Principal

Total **Enclosed**

Additional

Escrow

Doc 52 <u>Filed 06/29/15 Entered 06/29/15 10:52:26</u> Desc Main IMPORTANT CALIBRE FOME LOANS CONTACT INFORMATION

Payments: P.O. Box 650856 Dallas, TX 75265-0856

Overnight Payments or Mail: 13801 Wireless Way Oklahoma City, OK 73134

Fax Numbers: Fax payoff requests: 1-405-608-2003

Ouestions about Tax: Phone:1-800-248-3015 P.O. Box 2515 Covina, CA 91722

Currespondence Address: P.O. Box 24610 Oklahoma City, OK 73124

Questions about Mortgage Insurance: Post Dated Check Payments: Phone:1-866-825-9268 P.O. Box 7731 Springfield, OH 45501

Caliber Home Loans, Inc. P.O. Box 271760 Oklahoma City, OK 73137-1760 Principal and Escrow Only Payments Caliber Home Loans, Inc. Attn: POP or Escrow P.O. Box 272556 Oklahoma City, OK 73137-2556

TTY to Voice 7-1-1 or 1-800-735-2989

Spanish to English 7-1-1 or 1-888-777-5861

Notice of Error, Requests for Information and Qualified Written Requests (as defined in RESPA) must be sent to: PO Box 24610, Oklahoma City, OK 73124. You have certain rights under federal law to resolve errors and request information related to your account. For more information about these rights, you can go to CaliberHomeLoans.com or contact us.

IMPORTANT PAYMENT INFORMATION

Payment Options: Caliber Home Loans, Inc. provides you the following options for making your loan payments.

Mail: P.O. Box 650856, Dallas, TX 75265-0856

Pay-by-phone**: 1-800-401-6587

** A fee may apply for this service.

Pay-by-phone **: A fee may apply for this service.

Online Services: Caliber Home Loans, Inc. offers a variety of online services to help you better manage your mortgage loan including:

Payments

Blectronic Statements

"Notify me" alerts for payments received or escrow disbursements "Notify me" alerts for payments received or escrow disbursements

You can also view your loan payment history, amortization schedule, principal batance, interest rate and escrow account activity. Simply visit www.CaliberHomeLeans.com and select "Customer Login" from the home page. For further assistance please contact us at 1-800-401-6587.

Payment Information: Additional Amount: Please designate how you want additional funds to be applied; we will apply them as directed provided your account is current. If your account is current, undesignated funds will be applied per the terms of your mortgage loan documents. Regardless of the account status, principal prepayments will only be applied to your account if your contract allows for prepayments.

Pleaso be prompt. Payments must reach Caliber Home Loans, Inc. by the due date. Your payment is credited on the day it is received at our payment center, not the day it is postmarked. Payments are not accepted at Caliber Home Loans, Inc. origination offices.

Notice of Negative Information: We may report information about your account to the Credit Bureaus. Late payment, missed payments, other defaults, or bankruptcy filing on your account may be reflected in your credit report.

INSURANCE/PROPERTY TAX INFORMATION

Insurance Requirements: The terms of your loan require that you maintain homeowner's insurance coverage. We suggest that you consult your insurance company to determine these coverage amounts. Flood insurance is required for all properties located in a Special Flood Hazard Area as designated by FEMA. Policy Information: To protect our mutual interests, the mortgage clause of your policy must include the following: Caliber Home Loans ISAOA, P.O. Box 7731, Springfield, OH 45501. You may also mail or fax a copy of the declaration page to our office (Fax # 1-937-525-4120). For insurance questions you can reach our Insurance Department at 1-866-825-9268.

Property: In the event of damage to your home, notify your insurance agent. After the claim has been filed, please contact us at 1-866-940-2335 so that we may guide you through this process.

Loans with Escrowed Tax: For Tax questions call I-800-248-3015. If your property taxes are paid from an escrow account with us and you receive a tax bill, please forward the bill immediately to the following address: Caliber Home Loans, Inc., P.O. Box 2515, Covins, CA 91722. Please he sure to write your loan number on the bill. You may also fax current tax bills to our Tax Department at 1-526-567-5419. Evidence of payment for delinquent taxes should be faxed to 626-543-1945.

Policy Information: To protect our mutual interests, the loss payee clause of your policy must include the following: Caliber Home Loans ISAOA. P.O. Box 979046 Miami, FL 33197-9046. You may also mail or fax a copy of the declaration page to our office (Fax #305-964-4766). For Non-Mortgage insurance questions, you can reach our insurance Department at 1-800-554-4919.

ŗ	EE SCHI	EDULE (UN	ILESS LIMITED BY STATE LAW)*		
Appraisal Fee (up to):	\$	700.00	Late Fees:		Varies
Automated Payment by Phone:		Varies	Property Inspection (up to):	s	55.00
Bankruptcy Attorney Fees:		Varies	Recast (Fee may apply contact Customer Service)		
BP(Brokers Price Opinion) (up to);	\$	250.00	Release / Reconveyance Fee (up to):	s	124.50
Fax Fee (up to);	\$	10.00	Returned Check Fee (up to):	s	30.00
Fax Foo FHA:	\$	5,00		-	
Foreclosure Attorney Pees:		Varies	*May be subject to change		

MORTGAGE COUNSELING AND ASSISTANCE AND BANKRUPTCY NOTICE

Mortgage Counseling and Assistance: If you would like counseling or assistance, you can find a list of counselors in your area on the U.S. Department of Housing and Urban Development's website at www.hud.gov or catl 1-809-569-4287.

Automated Account Information: Account information is easy to access through Caliber Home Loans, Inc. Automated Phone Service by calling 800-401-6587. Please have your loan number and your Social Security Number to access this convenient service. Automated information is available 247.

Consumer Complaints and Inquiries: You can direct any complaints and inquiries to Caliber Home Loans, Inc. by referencing the "Contact Us" section on the first page of this statement. You have the right to file complaints about Caliber Home Loans with your state banking department.

Bankruptcy Notice: Please note that notwithstanding anything herein to the contrary, in the event you are subject to an "Automatic Stay" issued by a United States Bankruptcy court, this communication is not intended to collect, assess, or recover a debt. In the event the referenced debt has been discharged in bankruptcy, this communication is not intended to collect, recover, or offset any such debt as a personal liability to you. Please be advised that this communication constitutes neither a demand for payment nor a notice of personal liability. However, unless the bankruptcy court first personal bankruptcy fling, whatever rights we hold in the property that secures the obligation remain unimpoired. This means that unless otherwise ordered by the bankruptcy court, if the requirements of the loan document are not met and the "Automatic Stay" is no longer in effect, we can pursue whatever remedy rights we hold in the property pursuant to the security agreement, such as the right to foreclose. This notice is not intended as legal advice and you should consult your lawyer if you have any legal questions about your rights.

This is an aftempt by a debt collector to collect a consumer debt and any information obtained will be used for that purpose.

Case 11-36977-KRH Doc 52 Filed 06/29/15 Entered 06/29/15 10:52:26 Desc Main Document Page 12 of 14

Case 11-36977-KRH Doc

Filed 11/17/14 Entered 11/17/14 14:51:59 Desc Main

Page 1 of 2 Document

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: **ELI RICH**

DEBTOR

CASE NO. 11-36977-KRH CHAPTER 13

RESPONSE TO NOTICE OF FINAL CURE PAYMENT PURSUANT TO BANKRUPTCY RULE 3002.1(g)

To the Clerk Debtors, Debtor's Counsel and Chapter 13 Trustee:

The Creditor, U.S. Bank Trust, N.A., as Trustee for VOLT Asset Holdings NPL3, agrees with the Notice of Final Cure payment filed on November 1, 2011.

The Creditor agrees that the amount required to cure the pre-petition delinquency as set forth in Creditor's claim and any supplements and/or amendments thereto has been paid in full.

The Debtor is contractually due for the November 1, 2014 payment.

<u>/s/ T.J. Stewart</u>

T.J. Stewart, Counsel for Creditor U.S. Bank Trust, N.A., as Trustee for VOLT Asset Holdings NPL3 State Bar Number 48412

Exhibit B

Case 11-36977-KRH Doc 52 Filed 06/29/15 Entered 06/29/15 10:52:26 Desc Main Document

Page 13 of 14

Case 11-36977-KRH Doc

Entered 11/17/14 14:51:59 Desc Main Filed 11/17/14 Document Page 2 of 2

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: ELI RICH -

DEBTOR

CASE NO. 11-36977-KRH CHAPTER 13

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that the RESPONSE TO NOTICE OF FINAL CURE PAYMENT PURSUANT BANKRUPTCY RULE 3002.1(g) in the above captioned case were this day served upon the below named persons by electronic service and/or by mailing, postage prepaid, first class mail a copy of such instrument to each person(s), parties, and/or counsel at the addresses shown below:

Eli Rich 3131 Cove View Lane Midlothian, VA 23112

Robert A. Canfield 2201 Libbie Ave., Suite 200 Richmond, VA 23230

Robert E. Hyman P.O. Box 1780 Richmond, VA 23218-1780

This 17th day of November, 2014.

/s/ Ryan Tomlin Ryan Tomlin Brock & Scott, PLLC 5121 Parkway Plaza Blvd., Suite 300 Charlotte, NC 28217 Ph: (704) 369-0676 Fax: (704) 369-0760

bankruptcy@brockandscott.com



P.O. Box 24610 Oklahoma City, OK 73124-0610

March 30, 2015

ELI RICH C/O CANFIELD, BAER, LLP 2201 LIBBIE AVE, STE 200 RICHMOND, VA 23230

Caliber Account Number: 9800912579

Dear Counsel:

Caliber Home Loans, Inc. ("Caliber") is writing to acknowledge receipt of written communication informing Caliber that you are representing the borrower(s) in connection with the above-referenced account.

In accordance with the Federal Fair Debt Collection Practices Act, please be advised that you will receive all collections and account correspondence regarding the above-referenced account.

Please be aware that you will continue to receive all collections and account correspondence regarding the above-referenced account until you or the borrower(s) notify Caliber Home Loans, Inc. that you are no longer representing the borrower(s). If you are not representing the borrower(s) in connection with the above-referenced account, please contact Caliber's Account Resolution Department at 1-800-621-1437 so that the account may be updated appropriately. Representatives are available Monday through Thursday 8:00 a.m. to 9:00 p.m., Friday 8:00 a.m. to 7:00 p.m., and Saturday 8:00 a.m. to 4:00 p.m., Central Time.

Sincerely,

Account Resolution Department Caliber Home Loans, Inc.

THIS IS AN ATTEMPT BY A DEBT COLLECTOR TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Notice to Consumers presently in Bankruptcy or who have a Bankruptcy Discharge: If you are a debtor presently subject to a proceeding in Bankruptcy Court, or if you have previously been discharged from this debt by a Federal Bankruptcy Court, this communication is not an attempt to collect a debt but is sent for informational purposes only or to satisfy certain Federal or State legal obligations.

APR 6 2015

EXHIBIT